

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

IN RE PORK ANTITRUST  
LITIGATION

This Document Relates To: ALL CASES

No. 0:18-cv-01776

Hon. John R. Tunheim  
Magistrate Judge Hildy Bowbeer

**CLASS PLAINTIFFS' MOTION FOR ENTRY OF AN ORDER  
GRANTING DISCOVERY UNDER THE CABLE ACT**

Direct Purchaser Plaintiffs, Consumer Indirect Purchaser Plaintiffs, and Commercial and Institutional Indirect Purchaser Plaintiffs (collectively, "Class Plaintiffs"), by and through their undersigned counsel, hereby move this Court for entry of an Order granting discovery under the Cable Communications Policy Act of 1984, 47 U.S.C. § 551 (the "Cable Act"). In support, Plaintiffs state as follows:

1. Plaintiffs have served subpoenas on telephone carriers seeking the production of documents relating to calls and text messages made to and from the entities named as Defendants in this litigation and certain of their employees believed to have information relevant to this litigation.

2. Plaintiffs anticipate that certain telephone carriers will respond that they will produce records only in response to subpoenas issued by law enforcement agencies, governmental entities, or pursuant to court orders. The entry of an Order under the Cable Act will therefore allow for the production of these records.

3. A copy of the proposed Order Granting Discovery Under the Cable Act is attached hereto as Exhibit A.

4. Defendants take no position on this Motion or the proposed Order.

WHEREFORE, Class Plaintiffs respectfully request this Court enter an Order granting discovery under the Cable Communications Policy Act of 1984, 47 U.S.C. § 551.

Dated: December 9, 2020

Respectfully submitted,

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